Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

April 30, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Taryn A. Merkl, U.S.M.J.
225 Cadman Plaza East
Courtroom 13D South
Brooklyn, NY 11201-1804

Re: Hernandez v. Happy Street LLC, et al.

Case No.: 1:22-cv-6918 (DG) (TAM)

Dear Judge Merkl:

This firm represents the Defendants in this case, who respectfully submit this letter jointly with Plaintiff to submit their joint proposed case management worksheet and to request a one (1) week extension of time for the deadline to select a mediator.

The parties have contacted several mediators with whom they have agreed, in principle, to mediate with but are still confirming their availability and would like an additional week in order to select the appropriate mediator.

Accordingly, sufficient good cause exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

The parties thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York March 22, 2024

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Attorneys for Defendants Happy Street LLC, Happy Street Too LLC, and Slobodan Radivojevic a/k/a Bob Radivojevic

Enclosure.

VIA ECF

Levin-Epstein & Associates, P.C.

Attn: Joshua Levin-Epstein & Jason Mizrahi, Esqs.
60 East 42nd Street, Suite 4700

New York, NY 10165
(212) 792-0048 (office)
jason@levineepstein.com
joshua@levinepstein.com

Attorneys for Plaintiff Aaron Hernandez